

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN – SOUTHERN DIVISION

PEARLIE JACKSON, Personal
Representative of the Estate of
Stanley Jackson,

Plaintiff,

vs.

Case No: 12-cv-10963
Honorable Denise Page Hood
Magistrate Judge Laurie J. Michelson

WASHTENAW COUNTY,
DEPUTY THOMAS MERCURE,
DEPUTY DEAN REICH,
DEPUTY SEAN URBAN,
DEPUTY HOLLY FARMER

Defendants.


AFFIDAVIT OF
JEFFREY M. JENTZEN, M.D., Ph.D.

I, Jeffrey M. Jentzen, M.D., Ph.D., state the following:

1. I am the Medical Examiner of Washtenaw County, Michigan, and Professor and Director, Autopsy and Forensic Services, the University of Michigan Department of Pathology.
2. On August 21, 2010, I conducted the autopsy on Stanley H. Jackson, Autopsy No. WME-10-588.
3. In my opinion, Stanley Jackson died from a cardiac arrest due to non-occlusive ischemic heart disease associated with stress.
4. The autopsy reference to adrenergic stress reaction included a number of variables related to the stress, none more causative than any other.
5. Within a reasonable degree of medical certainty, the TASER application was not the direct cause of his death.
6. Other force options would have had similar or greater effects upon Mr. Jackson.

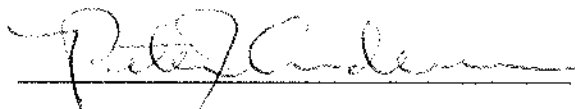
7. In my Autopsy Report, No. WME-10-588, references to "dart perforations" [bates 0153, 0156, 0161], are consistent with one dart deployment and three direct-stun applications as referenced the officers' police reports.
8. It is possible that an individual drive-stun may create multiple wounds if the recipient suspect is, for example, slippery from perspiration or moving to resist the exposure.
9. I am familiar with the facts stated in this Affidavit, and if sworn as a witness, I can testify to the truth of matters described herein except as to those based upon best knowledge and belief, which I in good faith believe to be true.

Affiant further sayeth not.


Jeffrey M. Jentzen, M.D., Ph.D.,

STATE OF MICHIGAN)
COUNTY OF WASHTENAW)

On this 23 day of September, 2013, before me, the subscriber, a Notary Public in and for said County, personally appeared Jeffrey M. Jentzen, M.D., Ph.D., to me known to be the person described in and who executed the foregoing Affidavit and acknowledged the execution thereof to be his free act and deed.



_____, Notary Public
Washtenaw County, MI
My Commission expires: _____

Prepared by:
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